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METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

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November 6, 2002

Email and U. S. Postal Mail

Mr. J. Tyler Carlson
 Western Area Power Administration
 Desert Southwest Regional Manager
 P.O. Box 6457
 Phoenix, AZ 85005-6457

Dear Mr. Carlson:

Comments on the Post 2008 Re-Marketing Effort for the Parker-Davis Project

The Metropolitan Water District of Southern California (Metropolitan) submits the following formal comments on the Post 2008 Re-Marketing Effort for the Parker-Davis Project (P-DP). These comments are timely submitted in accordance with the notice provided in the Federal Register, Volume 67, No. 153, dated Thursday, August 8, 2002.

Metropolitan appreciates the efforts put forth by the Western Area Power Administration (Western) during this Post-2008 Remarketing process. Metropolitan supports the extension of a major portion of the existing firm power sales commitments for an additional 20 years under the framework established by the Power Marketing Initiative (PMI). Metropolitan also supports a more efficient and lower cost proposal by Western to create a single one-time resource pool of a definite size rather than incremental resource pools.

Regarding the size of the resource pool, Metropolitan requests that Western coordinate closely with the Bureau of Reclamation to evaluate existing contractual commitments and future Priority Use Power needs which may result in either: (1) a reduction in the proposed 6% resource pool size or (2) a description of the size of the resource pool power as subject to modification.

Metropolitan is not a Parker-Davis Project contractor but is a preference entity located within the Boulder City marketing area, and therefore believes it is eligible to request an allocation of the Parker-Davis Project resource pool as a new customer. Based on Part V of Western's Marketing Criteria (Federal Register, Volume 49, No. 251, dated Friday, December 28, 1984), surplus power reserved for allocation to new or current contractors according to Section 9(c) of the Reclamation Project Act lists the first priority for allocation as preference entities within the Boulder City marketing area. Please confirm Metropolitan's understanding that it can participate in the Re-Marketing effort of the Parker-Davis Project as a new customer.

Mr. J. Tyler Carlson

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Lastly, Metropolitan wants to confirm the Post 2008 remarketing efforts will have no impact to Metropolitan's entitlement to 50% the Parker Power Plant as specified in contract ILR-712 with the Bureau of Reclamation.

Metropolitan appreciates the opportunity to provide comments for your response. If you have any questions, you may contact me at (213) 217-7381, email jlambek@mwdh2o.com or Ms. Ann Finley at (213) 217-7136, email afinley@mwdh2o.com.

Sincerely,



Jon C. Lambek
Manager of Operations Planning

ATF:
post 2008 comments 10-02

cc: Robert Johnson
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